

FILED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

2002 MAY 13 AM 9:18

CLERK  
U.S. DISTRICT COURT

JESSICA REED and ALEXIS SLEET, )  
minors by and through their mother, )  
REBECCA REED and TIATISHA )  
REED, a minor by and through her )  
mother, APRIL REED, )

Case No. 02 C 1151

Plaintiffs, )

Judge Bucklo

v. )

Jury Demand

P. O. BRADLEY HESPE #15218 and )  
P.O. JAMES VASAVID #19359, )  
Individually, )

Defendants. )

DOCKETED  
MAY 14 2002

**EX-PARTE NOTICE OF FILING**

PLEASE TAKE NOTICE that on 13 day of May, 2002, I caused to be filed with the Clerk of the United States District Court for the Northern District of Illinois the attached FIRST AMENDED COMPLAINT, copies of which are attached.

  
GREGORY E. KULIS AND ASSOCIATES

GREGORY E. KULIS AND ASSOCIATES  
30 North LaSalle Street  
Suite 2140  
Chicago, Illinois 60602  
(312) 580-1830



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**FIRST AMENDED COMPLAINT**

NOW COMES the Plaintiffs, TIFFANY JENKINS, ALEXIS SLEET, minors by and through their mother, REBECCA REED and TIATISHA REED, a minor, by and through her mother APRIL REED, by and through their attorneys, GREGORY E. KULIS AND ASSOCIATES, and complaining against the Defendants, P. O. BRADLEY HESPE #15218 and P.O. JAMES VASAVID #19359, as follows:

**COUNT I – EXCESSIVE FORCE**

- 1) This action is brought pursuant to the Laws of the United States Constitution, specifically, 42 U.S.C. §1983 and §1988, and the laws of the State of Illinois, to redress deprivations of the Civil Rights of the Plaintiff and accomplished by acts and/or omissions of the Defendants committed under color of law.
- 2) Jurisdiction is based on Title 28 U.S.C. §1343 and supplemental jurisdiction of the State of Illinois.

- 3) The Plaintiffs, JESSICA REED, ALEXIS SLEET and TIATISHA REED at all relevant times were United States citizens and permanent residents of the State of Illinois, City of Chicago.
- 4) The Defendants, BRADLEY HESPE and JAMES VASAVID, were at all relevant times duly appointed police officers of the City of Chicago and at all relevant times were acting within their scope of employment.
- 5) On October 20, 2001, the Plaintiffs were in front of the building at 4058 W. Van Buren.
- 6) The Defendants, BRADLEY HESPE and JAMES VASAVID, pulled up and detained them.
- 7) One or more of the Plaintiffs told the Defendants they lived next door.
- 8) The Plaintiffs were not committing any crime or breaking any laws.
- 9) The Defendants took the Plaintiffs into custody.
- 10) Without any justifiable cause or provocation the Defendant, BRADLEY HESPE threw the Plaintiff, JESSICA REED into the squad and manhandled her.
- 11) Without any justifiable cause or provocation the Defendant, JAMES VASAVID threw the Plaintiff, TIATISHA REED against a brick wall.
- 12) Without any justified cause or provocation, Defendant, BRADLEY HESPE threw the Plaintiff, ALEXIS SHEET against the wall.
- 13) The force used was unprovoked, excessive and unreasonable.
- 14) Said action of the Defendants, BRADLEY HESPE and JAMES VASAVID was intentional, willful and wanton.

- 15) Said actions of the Defendants violated the Plaintiffs' Fourth Amendment Rights of the United States Constitution and were in violation of said rights protected by 42 U.S.C. §1983.
- 16) As a direct and proximate consequence of said conduct of the Defendants, BRADLEY HESPE AND JAMES VASAVID, the Plaintiffs, JESSICA REED, ALEXIS SLEET and TIATISHA REED suffered violations of their constitutional rights, emotional anxiety, mental trauma, humiliation, fear, anxiety, pain, and suffering.

WHEREFORE, the Plaintiffs, JESSICA REED and ALEXIS SLEET, minors by and through their mother, REBECCA REED and TIATISHA REED, a minor, by and through her mother, APRIL REED pray for judgment against the Defendants, P. O. BRADLEY HESPE #15218 and P.O. JAMES VASAVID #19359 jointly and severally in the amount of TWENTY THOUSAND AND 00/100 (\$20,000.00) DOLLARS compensatory damages and TEN THOUSAND AND 00/100 (\$10,000.00) DOLLARS punitive damages, plus attorneys fees and costs.

#### **COUNT II-FALSE ARREST**

- 1-15) The Plaintiffs TIFFANY JENKINS, ALEXIS SLEET, minors by and through their mother, REBECCA REED and TIATISHA REED, a minor, by and through her mother APRIL REED, hereby reallege and incorporate their allegations of paragraphs 1-13 of Count I as their respective allegations of paragraph 1-13 of Count II as though fully set forth herein.
- 16) The Defendants, BRADLEY HESPE and JAMES VASAVID had no probable cause to take the Plaintiffs into custody.
- 17) The Plaintiffs were ultimately released at the scene.

- 18) As a direct and proximate consequence of said conduct of the Defendants, BRADLEY HESPE and JAMES VASAVID the Plaintiffs suffered violations of their constitutional rights, emotional anxiety, mental trauma, humiliation, fear, anxiety, pain and suffering.

WHEREFORE, the Plaintiffs, JESSICA REED and ALEXIS SLEET, minors and by and through their mother, REBECCA REED and TIATISHA REED, a minor, by and through her mother, APRIL REED pray for judgment against the Defendants, P. O. BRADLEY HESPE and P.O. JAMES VASAVID jointly and severally in the amount of TWENTY THOUSAND AND 00/100 (\$20,000.00) DOLLARS compensatory damages and TEN THOUSAND AND 00/100 (\$10,000.00) DOLLARS punitive damages, plus attorneys fees and costs.

**COUNT III- UNLAWFUL DETENTION/STATE LAW**

- 1-12) The Plaintiffs, TIFFANY JENKINS, ALEXIS SLEET, minors by and through their mother, REBECCA REED and TIATISHA REED, a minor, by and through her mother APRIL REED, hereby reallege and incorporate their allegations of Paragraph 3-14 of COUNT II as their respective allegations of paragraph 1-12 of COUNT III as though fully set forth herein.
- 13) The Defendants then handcuffed and detained the Plaintiffs without any probable cause.
- 14) As a direct and proximate consequence of said conduct of the Defendants, BRADLEY HESPE and JAMES VASAVID, the Plaintiffs, JESSICA REED, ALEXIS SLEET and TIATISHA REED suffered violations of emotional anxiety, mental trauma, humiliation, fear, anxiety, pain, and suffering.

WHEREFORE, the Plaintiffs, JESSICA REED and ALEXIS SLEET, minors and by and through their mother, REBECCA REED and TIATISHA REED, a minor, by and through her mother, APRIL REED prays for judgment against the Defendants, P.O. BRADLEY HESPE # 15218 and P.O. JAMES VASAVID #19359 jointly and severally in the amount of TWENTY THOUSAND AND 00/100 (\$20,000.00) DOLLARS compensatory damages and TEN THOUSAND AND 00/100 (\$10,000.00) DOLLARS punitive damages, plus attorneys fees and costs.

**JURY DEMAND**

The Plaintiffs requests trial by jury.

Respectfully submitted,  
JESSICA REED, ALEXIS SLEET, minors by and through their mother, REBECCA REED and TIATISHA REED, a minor by and through her mother, APRIL REED,

By:   
GREGORY E. KULIS AND ASSOCIATES  
Attorneys for the Plaintiffs

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